## **April MBR Talking Points**

## Nonresponsive based on revised scope

## 2. Roulette

• 180 day deadline: March 17, 2021

## Permit issuance was delayed because:

- As a result of COVID, local government claimed that additional time was necessary to provide them and the public an opportunity to review. To ensure transparency and adequate public and local government review, EPA agreed to extend the comment period from 30 days to 90 days.
- Additionally, the Seneca Nation in Region II requested consultation. As this is the first consultation that the UIC program has engaged in, we have spent a great deal of time and effort defining with the Seneca Nation, the consultation process and informing the tribe of the project and controls to be required to protect the environment.

**Resolution**: We are actively engaged in consultation with a meeting scheduled in late April. Goal is to issue final permit in late May/early June